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Docket No.: 52-026

ND-23-0044  
10 CFR 52.99(c)(1)

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555-0001

Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Unit 4  
ITAAC Closure Notification on Completion of ITAAC 3.3.00.14 [Index Number 820]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 3.3.00.14 [Index Number 820]. This ITAAC confirms that a report exists and concludes that the external walls, doors, ceilings, and floors in the main control room, the central alarm station, and the secondary alarm station are bullet-resistant to at least Underwriters Laboratory Ballistic Standard 752, level 4. The closure process for this ITAAC is based on the guidance described in Nuclear Energy Institute (NEI) 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52," which was endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,



Jamie M. Coleman  
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4  
Completion of ITAAC 3.3.00.14 [Index Number 820]

JMC/LBP/sfr

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cc:      Regional Administrator, Region II  
         Director, Office of Nuclear Reactor Regulation (NRR)  
         Director, Vogtle Project Office NRR  
         Senior Resident Inspector – Vogtle 3 & 4

**Southern Nuclear Operating Company  
ND-23-0044  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 4  
Completion of ITAAC 3.3.00.14 [Index Number 820]**

## **ITAAC Statement**

### **Design Commitment**

14. The external walls, doors, ceiling, and floors in the main control room, the central alarm station, and the secondary alarm station are bullet-resistant to at least Underwriters Laboratory Ballistic Standard 752, level 4.

### **Inspections/Tests/Analyses**

Type test, analysis, or a combination of type test and analysis will be performed for the external walls, doors, ceilings, and floors in the main control room, the central alarm station, and the secondary alarm station.

### **Acceptance Criteria**

A report exists and concludes that the external walls, doors, ceilings, and floors in the main control room, the central alarm station, and the secondary alarm station are bullet-resistant to at least Underwriters Laboratory Ballistic Standard 752, level 4.

## **ITAAC Determination Basis**

A combination of type testing and analysis was performed for the external walls, doors, ceilings, and floors in the main control room (MCR), the central alarm station (CAS), and the secondary alarm station (SAS) to demonstrate that the external walls, doors, ceilings, and floors in the MCR, CAS, and SAS are bullet-resistant to at least Underwriters Laboratory Ballistic Standard 752 (UL 752), level 4 and satisfy the applicable bullet-resisting physical barrier requirements of the VEGP Units 1-4 Physical Security Plan associated with 10 CFR 73.55(e)(5). The VEGP Unit 4 Plant Security System ITAACs only cover the Unit 4 plant security system design commitment scope.

Type testing was performed on the materials, used to construct the access doors to the MCR, CAS and SAS, to at least UL 752 Level 4 using guidance in Regulatory Guide 5.76 (Reference 1). The testing consisted of discharging a weapon using the appropriate caliber ammunition at a sample of the protective material in a controlled environment and inspecting the protective material to ensure protection is provided against complete penetration, passage of fragments of projectiles, and spalling (fragmentation) of the protective material that could cause injury to a person standing directly behind the bullet-resisting barrier.

Analyses were performed to demonstrate that the as-built external walls, floors, and ceilings of the MCR, CAS and SAS meet bullet-resistant criteria. The analyses verified that the as-built attributes of the external walls, floors, and ceilings (e.g., concrete thickness, concrete compressive strength, etc.) meet the design attributes needed to ensure protection is provided against complete penetration, passage of fragments of projectiles, and spalling (fragmentation) of the protective material that could cause injury to a person standing directly behind the bullet-resisting barrier. Penetration openings in the MCR, CAS, and SAS external wall, floor and ceiling structures are either sealed with a high-density sealant, provided with a bullet resistant design (e.g., angled entry with steel shields) preventing direct line of sight to normally occupied areas of the MCR, CAS and SAS, the penetration itself is routed with angles or baffled within the wall, floor, or ceiling structure, or any combination thereof.

The CAS and SAS are common to both Units 3 and 4. ITAAC Technical Report SV3-SES-ITR-800820 (Reference 2) concludes that the external walls, doors, ceilings, and floors in the CAS and SAS are bullet-resistant to at least Underwriters Laboratory Ballistic Standard 752, level 4. The results of the type testing and analyses for Unit 4 MCR are documented in ITAAC Technical Report SV4-SES-ITR-800820 (Reference 3) and conclude that the external walls, doors, ceilings, and floors in the main control room, are bullet-resistant to at least UL 752, level 4.

References 2 and 3 are available for NRC inspection as part of the Unit 4 ITAAC 3.3.00.14 Completion Package (Reference 4).

### **ITAAC Finding Review**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there were no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 3.3.00.14 (Reference 4) and is available for NRC review.

### **ITAAC Completion Statement**

Based on the above information, SNC hereby notifies the NRC that ITAAC 3.3.00.14 was performed for VEGP Unit 4 and that the prescribed acceptance criteria was met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

### **References (available for NRC inspection)**

1. Regulatory Guide 5.76, Physical Protection Programs at Nuclear Power Reactors, July 2009 (Safeguards Information)
2. SV3-SES-ITR-800820, MCR, CAS, SAS Bullet Resistant Summary Report, Rev 0 (Security Related Information)
3. SV4-SES-ITR-800820, MCR, CAS, SAS Bullet-Resistant Summary Report, Rev 0 (Security Related Information)
4. 3.3.00.14-U4-CP-Rev0, ITAAC Completion Package